

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GAVRIELI BRANDS LLC, a California
Limited Liability Company,

Plaintiff,

v.

SOTO MASSINI (USA) CORP., a Delaware
corporation; and THOMAS PICHLER, an
individual,

Defendants.

Case No. 18-cv-00462-MN

**PLAINTIFF GAVRIELI BRANDS LLC’S MOTION FOR
A PERMANENT INJUNCTION, ATTORNEYS’ FEES,
ENHANCED DAMAGES, AND PRE- AND POST-JUDGMENT INTEREST**

Pursuant to 35 U.S.C. § 283, Fed. R. Civ. P. 65(d), plaintiff Gavrieli Brands, LLC (“Gavrieli”) hereby moves the Court for entry of a permanent injunction in the form submitted contemporaneously herewith.

Additionally, pursuant to 35 U.S.C. § 285, 15 U.S.C. § 1117(a), Fed. R. Civ. P. 54(d)(2), and the Court’s inherent power, Gavrieli hereby moves the Court for a determination that the instant case is exceptional and for an award of Gavrieli’s attorneys’ fees.

Further, pursuant to 15 U.S.C. § 1117(a), Gavrieli hereby moves the Court for a tripling of the damages awarded by the jury in the instant action.

Additionally, pursuant to 35 U.S.C. § 284 and 15 U.S.C. § 1117(b), Gavrieli hereby moves the Court for an award of pre-judgment interest.¹

¹ The Court has already awarded Gavrieli post-judgment interest. *See* D.I. 149 ¶ 12. Gavrieli now moves the Court for entry of a judgment reflecting the precise amount of post-judgment interest—accrual of \$203.61 per day until the judgement is satisfied.

The basis for the instant motion is set forth in Gavrieli's Opening Brief, which is incorporated herein by reference.

Dated: June 27, 2019

Respectfully submitted,

MORAN, LEWIS & BOCKIUS LLP

/s/ Amy M. Dudash

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